UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED	STATES	OF	AMERICA	,)			
				,)			
	v.			,)	CRIMINAL	NO.	04-10332-RCL
				,)			
JOSEPH	MATZ			,)			
				,)			
		Dε	efendant)			

<u>JOINT MOTION FOR EXCLUDABLE DELAY FOR PERIOD FROM FEBRUARY 28,</u> 2005, UNTIL APRIL 27, 2005

As agreed to orally, the parties respectfully request the Court to order the period from February 28, 2005, to April 27, 2005, excluded under the Speedy Trial Act. In support of this request, the parties state the following:

- 1) The parties agreed orally at a status conference on February 28, 2005, to exclude the period from February 28, 2005, to April 14, 2005.
- 2) A hearing was scheduled for March 29, 2005, on Defendant's motion for additional discovery. The parties agreed to postpone this hearing until April 19, 2005, on the grounds that counsel for the Defendant would be in trial until approximately April 11th, and counsel for the Government would be unavailable until April, 14, 2005. This Court postponed that hearing until April 27, 2005.

WHEREFORE, the parties request that the period from February 28, 2005, be excluded for purposes of the Speedy Trial Act.

Respectfully submitted,

MICHAEL J. SULLIVAN United States Attorney

By: <u>/s/ S. Waqar Hasib</u>
S. WAQAR HASIB
Spec. Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify I have caused a copy of the foregoing document to be served on counsel of record via electronic filing this 25th day of April.

/s/ S. Waqar Hasib S. WAQAR HASIB Spec. Assistant U.S. Attorney